

December 17, 2018

Ms. Juliette Voinov Kohler
Secretariat of the Basel Convention
c/o Palais des Nations
8-14, avenue de la Paix
1211 Geneva 10
Switzerland

Via electronic mail: juliette.kohler@brsmeas.org

Re: UNEP/CHW/OEWG.11/INF/39, *Draft terms of reference for the Basel Convention Partnership on Plastic Wastes as a basis for further consultation.*

Dear Ms. Kohler,

The World Plastics Council (WPC) and American Chemistry Council (ACC) appreciate the opportunity to comment on UNEP/CHW/OEWG.11/INF/39, *Draft terms of reference for the Basel Convention Partnership on Plastic Wastes as a basis for further consultation*. WPC, ACC, and our association allies in other countries are taking steps to eliminate plastic waste in the environment. Under the Declaration of the Global Plastic Associations for Solutions on Marine Litter¹ we have launched 355 projects to reduce marine litter. ACC and WPC have also partnered with Ocean Conservancy and joined Circulate Capital, which has committed over \$100 million for waste management and recycling infrastructure development in marine litter source countries.

Section I. Goal – WPC and ACC strongly support the goal of the Partnership on Plastic Waste. We believe the Partnership offers an effective global venue to advance sound plastics waste management and encourage the Partnership to take a dynamic and active role in engaging and advancing policy with other global initiatives. In fact, studies show lack of waste collection and management in rapidly developing countries is the source of the vast majority of marine litter.²³ Further, Ocean Conservancy's *Stemming the Tide* report shows that collection and management of waste is the most useful solution to the marine litter problem.⁴ Partnerships such as those under this proposal will help solve this global problem.

¹ <https://www.marinelittersolutions.com/about-us/joint-declaration/>

² Jambeck et al, Plastic Waste Inputs from Land into the Ocean,
<http://science.sciencemag.org/content/347/6223/768.full?ijkey=BXtBaPzbQgagE&keytype=ref&siteid=sci>

³ World Bank Rapid Assessment, Indonesia Marine Debris Hotspot,
<http://documents.worldbank.org/curated/en/983771527663689822/pdf/126686-29-5-2018-14-18-6-SynthesisReportFullReportAPRILFINAL.pdf>

⁴ <https://oceanconservancy.org/wp-content/uploads/2017/04/full-report-stemming-the.pdf>

Section III. Objectives – We agree with recommendation to delete ‘with other global initiatives’. It is implied that work with other global initiatives would be included in working ‘collaboratively’. Inclusion of ‘other global initiatives’ could limit the scope of collaboration of the partnership with regional or national initiatives. We support the reference in the working principles under Section V calling for the working group to “coordinate and cooperate” with other bodies involved in activities concerning the management of plastic wastes. Information sharing and coordination, particularly through the Basel Convention Regional Centers (BCRCs), should be encouraged as work plans are developed.

The term ‘unnecessary or avoidable plastics’ is not defined, is ambiguous, and should be deleted. To illustrate, developed countries may not find water sachets necessary, yet developing nations without access to a reliable supply of potable water would consider this essential. We recommend focusing on sustainability, taking into account the life cycle impacts of plastics and alternatives. The term “single-use plastics” is not defined, is subject to misinterpretation, and should be deleted. It’s worth noting that “single-use” plastic can provide many important benefits that should not be overlooked. For example, “single use” plastic packaging plays an important role in helping to reduce food waste. A study by TruCost showed that replacing plastic packaging with alternatives would result in 3.8 times the environmental impacts, in part due to increased food waste.⁵ It would be more productive for the Partnership to identify specific areas of focus such as encouraging circular economy.

An objective the Partnership should include is promoting design and innovation to reduce the amount of plastic becoming waste. We oppose inclusion of “development of alternatives” as part of this objective. Even if the use of alternatives may reduce plastic becoming waste under some circumstances, the alternatives may have increased environmental impacts, such as increased total energy demand, expended energy, water consumption, solid waste by weight and by volume, global warming potential, acidification, eutrophication, smog formation, and ozone depletion.⁶

Promoting recycling and recovery should be listed as an objective and should include chemical recycling and plastics-to-fuel technology. These are examples of innovations that can help to reduce marine debris by capturing the value of post-use plastics as part of a suite of environmentally sound management approaches to plastic waste.

‘Control’ is duplicative with the development of a mechanism to monitor transboundary movement of plastic waste, which will control the movement of plastic waste. We recommend that this objective not be included as it would be difficult to operationalize given that the parties are still in the early stages of considering whether to amend the Convention annexes to control certain plastic wastes. Minimization of plastic waste is covered in Objectives (a) and (c).

WPC and ACC recommend including of an additional objective, promoting and advancing the development of adequate waste management infrastructure to ensure the responsible collection and

⁵ Plastics and Sustainability, <https://plastics.americanchemistry.com/Plastics-and-Sustainability.pdf>

⁶ Franklin & Associates, <https://plastics.americanchemistry.com/Reports-and-Publications/LCA-of-Plastic-Packaging-Compared-to-Substitutes.pdf>

disposal of waste. Collection has been identified as the key first step to preventing plastic from leaking into the ocean.⁷

Section IV. Overall tasks – ‘Engaging in monitoring of transboundary movements of plastic wastes’ is a responsibility of national governments and not of the Partnership. This task should be deleted.

To complement the addition above under Objectives, we recommend including a task to promote and advance the development of adequate waste management infrastructure to help ensure the responsible collection and disposal of plastic. We also encourage the Parties to initiate work to update the 2002 Technical Guidelines for the Identification and Environmentally Sound Management of Plastic Wastes and for their Disposal to ensure current environmentally sound management practices and recycling technologies are appropriately referenced and applied.

Section IX. Membership – We support the membership provisions and will communicate with the Secretariat regarding our interest in becoming members of the new Partnership.

WPC and ACC believe the Partnership on Plastic Waste offers a beneficial platform to address leakage of plastic waste into the environment. If adopted by the 14th meeting of the Conference of the Parties to the Basel, Rotterdam, and Stockholm Conventions, WPC and ACC would request to be engaged in the Partnership on behalf of global plastic resin producers. If you have any questions or need further information, please contact Stewart Harris, Director, Marine and Environmental Stewardship, American Chemistry Council, at Stewart_Harris@americanchemistry.com or 202-249-6626.

Sincerely,

Stewart Harris
Director, Marine and Environmental Stewardship
American Chemistry Council, Plastics Division

⁷ Stemming The Tide, <https://oceanconservancy.org/wp-content/uploads/2017/04/full-report-stemming-the.pdf>

World Plastics Council: The World Plastics Council (WPC) is the platform for cooperation that engages the key leaders in the industry to address common issues and opportunities that are increasingly global. Effective and efficient solutions require global approaches and the WPC provides global leaders with the opportunity to deal with current issues in a fully anti-trust compliant forum, and to proactively address emerging issues before they grow and become more complex and expensive for the industry and society to manage.

American Chemistry Council: The American Chemistry Council represents the leading companies engaged in the business of chemistry in the United States. The business of chemistry supports over 25% of U.S. gross domestic product and creates the building blocks for 96% of all manufactured goods. As an \$800 billion enterprise, our industry provides 822,000 skilled high-paying American jobs. ACC helped establish [The Declaration of the Global Plastics Associations for Solutions on Marine Litter](#) which has led to over 355 projects to reduce marine litter and better control plastic waste. These projects have been undertaken by 74 associations that have signed the Global Declaration in 40 countries. ACC Plastics Division members committed circular economy goals whereby: 100% of plastics packaging is reused, recycled, or recovered by 2040; 100% of plastics packaging is recyclable or recoverable by 2030; and 100% of the U.S. manufacturing sites operated by Plastics Division members participate in [Operation Clean Sweep-blue](#) by 2020, with all of their manufacturing sites across North America involved by 2022.